

Employee Post-Travel Disclosure of Travel Expenses

Date/Time Stamp:
 RECEIVED
 SECRETARY OF THE SENATE
 PUBLIC RECORDS

Post-Travel Filing Instructions: Complete this form within 30 days of returning from travel. Submit all forms to the Office of Public Records in 232 Hart Building.

2021 OCT -5 PM 2: 38

In compliance with Rule 35.2(a) and (c), I make the following disclosures with respect to travel expenses that have been or will be reimbursed/paid for me. I also certify that I have attached:

- ☐ The **original** *Employee Pre-Travel Authorization* (Form RE-1), **AND**
☐ A **copy** of the *Private Sponsor Travel Certification Form* with all attachments (itinerary, invitee list, etc.)

The Pew Charitable Trusts

Private Sponsor(s) (list all):

Travel date(s): 9/10/2021-9/12/2021

Name of accompanying family member (if any):

Relationship to Traveler: ☐ Spouse ☐ Child

IF THE COST OF LODGING **DID NOT INCREASE** DUE TO THE ACCOMPANYING SPOUSE OR DEPENDENT CHILD, ONLY INCLUDE LODGING COSTS IN EMPLOYEE EXPENSES. (Attach additional pages if necessary.)

Expenses for Employee:

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses (Amount & Description)
<input type="checkbox"/> Good Faith Estimate	475	572	228	
<input checked="" type="checkbox"/> Actual Amount				

Expenses for Accompanying Spouse or Dependent Child (if applicable):

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses (Amount & Description)
<input type="checkbox"/> Good Faith Estimate				
<input type="checkbox"/> Actual Amount				

Provide a description of all meetings and events attended. See Senate Rule 35.2(c)(6). (Attach additional pages if necessary.): I participated in all events as scheduled. Reception at Gracie Mansion with Mayor de Blasio, breakfast & viewing of the reading of the names from 9/11, panel discussion on the federal recovery support post 9/11, lunch & Pew research trends presentation, response to 9/11 from the local side; Ellis Island ferry and dinner with Admiral McRaven, tour of 9/11 museum, Lessons learned during covid with small business owners and corporations and philanthropy, concluding with a presentation from prominent civic leaders and a opportunity to have lunch at Little Island. attached

9/23/21
(Date)

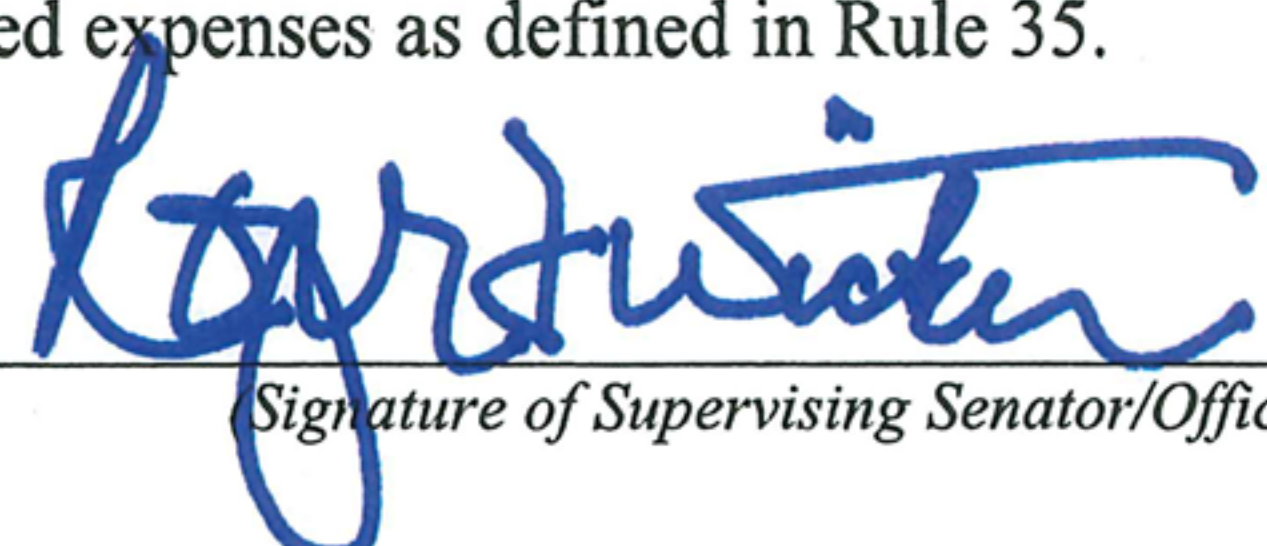
Michelle B. Richardson
(Printed name of traveler)

Michelle B. Richardson
(Signature of traveler)

TO BE COMPLETED BY SUPERVISING MEMBER/OFFICER:

I have made a determination that the expenses set out above in connections with travel described in the *Employee Pre-Travel Authorization* form, are necessary transportation, lodging, and related expenses as defined in Rule 35.

9/23/21
(Date)


(Signature of Supervising Senator/Officer)

EMPLOYEE PRE-TRAVEL AUTHORIZATION

Date/Time Stamp:

ETHIC AUG 9/21AM11-29

Pre-Travel Filing Instructions: Complete and submit this form at least 30 days prior to the travel departure date to the **Select Committee on Ethics in SH-220**. Incomplete and late travel submissions will **not** be considered or approved. This form **must** be typed and is available as a fillable PDF on the Committee's website at ethics.senate.gov. Retain a copy of your entire pre-travel submission for your required post-travel disclosure.

Name of Traveler: Michelle B. RichardsonEmploying Office/Committee: US Senator Roger F. WickerPrivate Sponsor(s) (list all): Pew Charitable TrustsTravel date(s): 9/10/21 - 9/12/21*Note: If you plan to extend the trip for any reason you **must** notify the Committee.*Destination(s): New York, NY

Explain how this trip is specifically connected to the traveler's official or representational duties:

As a Chief of Staff to a Republican Senator, this bipartisan chiefs conference enables me to build and strengthen relationships to further legislative goals for Senator Wicker. In addition, the programming regarding leadership and management will enable me to serve Senator Wicker better.

Name of accompanying family member (if any): _____

Relationship to Employee: ☐ Spouse ☐ Child

I certify that the information contained in this form is true, complete and correct to the best of my knowledge:

8/5/21
 (Date)


 (Signature of Employee)

TO BE COMPLETED BY SUPERVISING SENATOR/OFFICER (President of the Senate, Secretary of the Senate, Sergeant at Arms, Secretary for the Majority, Secretary for the Minority, and Chaplain):

Roger F. WickerMichelle B. RichardsonI, _____ hereby authorize _____
 (Print Senator's/Officer's Name) (Print Traveler's Name)

an employee under my direct supervision, to accept payment or reimbursement for necessary transportation, lodging, and related expenses for travel to the event described above. I have determined that this travel is in connection with his or her duties as a Senate employee or an officeholder, and will not create the appearance that he or she is using public office for private gain.

I have also determined that the attendance of the employee's spouse or child is appropriate to assist in the representation of the Senate. (signify "yes" by checking box) ☐

8/5/21
 (Date)


 (Signature of Supervising Senator/Officer)

Barlow Richardson, Michelle (Wicker)

From:
Sent:
To:
Subject:

Tamera Luzzatto, The Pew Charitable Trusts <grresponses@pewtrusts.org>
Tuesday, July 27, 2021 9:31 AM
Barlow Richardson, Michelle (Wicker)
Invitation to the Bipartisan Senate Chiefs of Staff Conference



Bipartisan Senate Chiefs of Staff Conference

The Pew Charitable Trusts

**Invites You and Your Spouse/Significant
Other
To the 8th Biennial**

**Senate Chiefs of Staff
Management and Leadership Conference**

**New York City
September 10–12, 2021**

The Pew Charitable Trusts will host a conference for the Senate Chiefs of Staff from September 10-12, 2021, in New York City. It promises to be an engaging and informative weekend where you can learn from some of the most interesting speakers on management,

leadership and civility today. A copy of the agenda is [available here](#).

We will depart from Union Station on Friday, September 10 on a private rail car and return on Sunday, September 12. Chiefs' expenses (minus alcohol and entertainment) are covered by The Pew Charitable Trusts. If you wish to invite your spouse, you may reimburse Pew for those expenses (estimated to be at least \$800 due to cost of needed travel during this weekend in NYC) after the conference.

Your pre-travel paperwork should be received by the Select Committee on Ethics, 220 Hart, by Monday, August 9, 2021 to ensure processing by the legal deadline. The Committee is very strict about their deadlines and will bar attendance by staff who submit late. For that reason, *we recommend you complete and submit immediately even if you're not sure you'll attend* as there is no penalty if you're approved but later decide you can't attend (other than we need to know as soon as possible if you change your mind). [Click here to download the paperwork.](#)

[CLICK HERE TO REGISTER \(USE .GOV EMAIL\)](#)

If you are unable to attend, please [click here](#)

We look forward to seeing you in New York City this fall!

Tamera Luzzatto
Senior Vice President, Government Relations
The Pew Charitable Trusts
tluzzatto@pewtrusts.org
(202) 540-6501

The Pew Charitable Trusts makes every effort to comply with federal, state, and local government ethics rules, including when hosting events. Please make sure that your participation is consistent with applicable ethics rules.

This email was sent to michelle_richardson@wicker.senate.gov

901 E Street NW, Washington, DC 20004-2008

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PRIVATE SPONSOR TRAVEL CERTIFICATION FORM

This form must be completed by any private entity offering to provide travel or reimbursement for travel to Senate Members, officers, or employees (Senate Rule 35, clause 2). Each sponsor of a fact-finding trip must sign the completed form. The trip sponsor(s) must provide a copy of the completed form to each invited Senate traveler, who will then forward it to the Ethics Committee with any other required materials. The trip sponsor(s) should **NOT** submit the form directly to the Ethics Committee. Please consult the accompanying instructions for more detailed definitions and other key information.

The Senate Member, officer, or employee **MUST** also provide a copy of this form, along with the appropriate travel authorization and reimbursement form, to the Office of Public Records (OPR), Room 232 of the Hart Building, within thirty (30) days after the travel is completed.

1. Sponsor(s) of the trip (please list all sponsors): The Pew Charitable Trusts
2. Description of the trip: Bipartisan Senate Chiefs of Staff Conference
3. Dates of travel: 9/10/2021 - 9/12/2021
4. Place of travel: New York, NY
5. Name and title of Senate invitees: Chiefs of Staff (see attached list)
6. I *certify* that the trip fits one of the following categories:
 - ☐ (A) The sponsor(s) are not registered lobbyists or agents of a foreign principal **and** do not retain or employ registered lobbyists or agents of a foreign principal **and** no lobbyist or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.
 - OR -**
 - ☒ (B) The sponsor or sponsors are not registered lobbyists or agents of a foreign principal, but retain or employ one or more registered lobbyists or agents of a foreign principal and the trip meets the requirements of Senate Rule 35.2(a)(2)(A)(i) or (ii) (*see question 9*).
7. ☒ I *certify* that the trip will not be financed in any part by a registered lobbyist or agent of a foreign principal.
 - AND -**
 - ☒ I *certify* that the sponsor or sponsors will not accept funds or in-kind contributions earmarked directly or indirectly for the purpose of financing this specific trip from a registered lobbyist or agent of a foreign principal or from a private entity that retains or employs one or more registered lobbyists or agents of a foreign principal.
8. I *certify* that:
 - ☒ The trip will not in any part be planned, organized, requested, or arranged by a registered lobbyist or agent of a foreign principal except for *de minimis* lobbyist involvement.
 - AND -**
 - ☒ The traveler will not be accompanied on the trip by a registered lobbyist or agent of a foreign principal except as provided for by Committee regulations relating to lobbyist accompaniment (*see question 9*).

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9. **USE ONLY IF YOU CHECKED QUESTION 6(B)**

I *certify* that if the sponsor or sponsors retain or employ one or more registered lobbyists or agents of a foreign principal, one of the following scenarios applies:

☐ (A) The trip is for attendance or participation in a one-day event (exclusive of travel time and one overnight stay) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip.

- OR -

☐ (B) The trip is for attendance or participation in a one-day event (exclusive of travel time and two overnight stays) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip (see questions 6 and 10).

- OR -

☒ (C) The trip is being sponsored only by an organization or organizations designated under § 501(c)(3) of the Internal Revenue Code of 1986 and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.

10. **USE ONLY IF YOU CHECKED QUESTION 9(B)**

If the trip includes two overnight stays, please explain why the second night is practically required for Senate invitees to participate in the travel:

11. ☒ An itinerary for the trip is attached to this form. I *certify* that the attached itinerary is a detailed (hour-by-hour), complete, and final itinerary for the trip.

12. Briefly describe the role of each sponsor in organizing and conducting the trip:

The Pew Charitable Trusts is the sole organizer and sponsor of this trip

13. Briefly describe the stated mission of each sponsor and how the purpose of the trip relates to that mission:

See attachment

14. Briefly describe each sponsor's prior history of sponsoring congressional trips:

See attachment

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15. Briefly describe the educational activities performed by each sponsor (other than sponsoring congressional trips):

see attachment

16. Total Expenses for Each Participant:

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses
<input checked="" type="checkbox"/> Good Faith estimate <input type="checkbox"/> Actual Amounts	\$230.4/ Amtrak roundtrip \$250.00 - coach bus in NYC \$120 - ferry to and from Ellis Island	\$286/night \$572 total	\$228 (\$76/day)	

17. State whether a) the trip involves an event that is arranged or organized *without regard* to congressional participation or b) the trip involves an event that is arranged or organized *specifically with regard* to congressional participation:

This trip has been arranged specifically with regard to congressional participation

18. Reason for selecting the location of the event or trip

New York was selected, as the weekend coincides with the 20th anniversary of the 9/11 terrorist attacks.

19. Name and location of hotel or other lodging facility:

New York Marriott Downtown

20. Reason(s) for selecting hotel or other lodging facility:

New York Marriott Downtown can provide the necessary meeting space for the planned seminars, is located in proximity to 9/11 Memorial & Museum and can provide the required number of guest rooms to accommodate the group

DocuSign Envelope ID: 22C6B771-9EBD-42DA-92C9-C7770306CCE9

21. Describe how the daily expenses for lodging, meals, and other expenses provided to trip participants compares to the maximum per diem rates for official Federal Government travel:

Lodging and meals are at the federal per diem rate for New York, NY.

22. Describe the type and class of transportation being provided. Indicate whether coach, business-class or first class transportation will be provided. If first-class fare is being provided, please explain why first-class travel is necessary:

Transportation to New York will be provided via coach Amtrak train. Transportation in NYC will be provided via coach buses and a ferry

23. ☒ I represent that the travel expenses that will be paid for or reimbursed to Senate invitees do not include expenditures for recreational activities, alcohol, or entertainment (other than entertainment provided to all attendees as an integral part of the event, as permissible under Senate Rule 35).

24. List any entertainment that will be provided to, paid for, or reimbursed to Senate invitees and explain why the entertainment is an integral part of the event:

n/a

25. I hereby certify that the information contained herein is true, complete and correct. (For trips involving more than one sponsor, you must include a completed signature page for each additional sponsor):

Signature of Travel Sponsor: Tamera Luzzatto

0E814E5130D2482

Name and Title: Tamera Luzzatto, Senior Vice President, Government Relations

Name of Organization: The Pew Charitable Trusts

Address: 901 E Street, NW, Washington, DC, 20004

Telephone Number: 202.540.6501

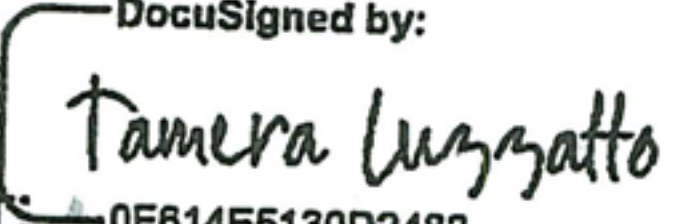
Fax Number: _____

E-mail Address: tluzzatto@pewtrusts.org

DocuSign Envelope ID: 22C6B771-9EBD-42DA-92C9-C7770306CCE9

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM
SIGNATURE PAGE FOR ADDITIONAL SPONSOR
(to be completed by each additional sponsor)

I hereby *certify* that the information contained on pages 1-4 of the certification form and any accompanying addenda, all submitted in connection with the September 10-12, 2021 trip
to New York, NY Place of Travel is true, complete, and correct. Dates of Travel (Month Day, Year)

Signature of Travel Sponsor:  DocuSigned by: Tamera Luzzatto
0E614E5130D2482...

Name and Title: Tamera Luzzatto, Senior Vice President, Government Relations

Name of Organization: The Pew Charitable Trusts

Address: 901 E NW Washington DC 20004

Telephone Number: 202.540.6501

Fax Number: _____

E-mail Address: tluzzatto@pewtrusts.org



Bipartisan Senate Chiefs of Staff Conference

New York City | September 10-12, 2021



Friday, September 10, 2021

- | | |
|-------------|--|
| 10:15am | Check in at Union Station, Starlight Lounge behind Gate D |
| 11:05am | Depart for NYC via Amtrak 84
Box lunch and beverages provided on board |
| 2:33pm | Arrive New York City, Penn Station/Moynihan Hall |
| 3:15pm | Check in to Marriott Downtown
85 West Street at Albany Street |
| 6:00pm | Meet in hotel lobby for transportation to Gracie Mansion |
| 6:30-8:30pm | Reception at Gracie Mansion hosted by Mayor Bill de Blasio and First Lady Chirlane McCray
Mayor de Blasio and First Lady Chirlane McCray will share reflections on the 9/11 attacks and the nation's largest city's approach to recovery from the effects of the COVID-19 pandemic on the city's economy and its citizens' health. |

Saturday, September 11, 2021

- | | |
|-----------------|---|
| 7:00-9:30am | Breakfast at your leisure
Marriott Hotel |
| 8:30-9:45am | Reading of the names of the 9/11 victims
– broadcast in the breakfast room |
| 10:00-11:30am | Panel discussion on federal recovery support after 9/11
As discussion of legislation for COVID recovery continues, panelists who were involved in the federal government's response to 9/11 will discuss their experiences. Tamera Luzzatto (The Pew Charitable Trusts), Polly Trottenberg (United States Deputy Secretary of Transportation), Jim Mazzaella (former Governor Pataki staff), and Glen Caplin (Senator Gillibrand's office). |
| 11:30am-12:00pm | Break |
| 12:00-1:30pm | Lunch with speaker from the Pew Research Center
Topic related to Senate duties, general politics data related to 9/11
TBD |

1:30-3:00pm	Speaker/Panel TBD – Voices of 9/11 Family members of victims of the 9/11 attack reflect on their experience and the federal government response.
3:00-5:30pm	Break
5:30pm	Meet in Marriott Lobby for walk to ferry to Ellis Island
6:30-7:30pm	Reception on Ellis Island
7:30-9:00	Dinner and Keynote address from Admiral William McRaven Admiral McRaven was the chief of the U.S. Special Operations Command (USSOCOM) which had responsibility for synchronizing Department of Defense plans against global terrorist networks and, as directed, conducting global operations. Under his watch, U.S. Special Operations Forces delivered what will be perhaps viewed as the crowning victory in America's war against terror: The May 2011 raid that killed al-Qaeda leader Osama bin Laden. After retiring from military service, he went on to serve as chancellor of the University of Texas and is recognized for his inspirational speeches and writing on leadership.
<u>Sunday, September 12, 2021</u>	
7:00-8:00am	Breakfast at your leisure, Marriott Hotel
8:00-9:00am	Visit to the 9/11 Tribute Museum
9:30am	Meet in lobby for checking out and transportation to the IAC Building, 555 West 18 th Street.
10:00am-11:00am	Session with New York City business leaders A panel of four small business owners led by Asahi Pompey, Global Head of Corporate Engagement, Goldman Sachs.
11:00am-12:00pm	Panel discussion of the overall economic impact of the pandemic and federal interventions to support recovery including Darren Walker, President of Ford Foundation; Jon Gray, President of Blackstone; and Anand Selva, CEO of Citi's Global Consumer Bank, and Joey Levin, CEO of IAC. Moderated by Kathryn Wylde, President of the non-profit Partnership for New York City.
12:00pm-12:30pm	Presentation by Barry Diller, Chairman of IAC, and Diane von Furstenberg
12:30pm-2:00pm	Walk to Little Island Picnic lunch.
2:15pm-2:45pm	Transportation to Penn Station
4:05pm	Depart Penn Station/Moynihan Hall for Washington via Amtrak 189 Snacks and beverages provided on board
7:35pm	Arrive Union Station Washington, DC

Bipartisan Senate Chiefs of Staff Conference September 10-12, 2021
List of Invited Staff

First	Last	Senator	State
Steve	Abbott	Senator Collins	ME
Michelle	Altman	Senator Lankford	OK
Rebecca	Avitia	Senator Heinrich	NM
Allyson	Bell	Senator Lee	UT
Rey	Benitez	Senator Ossoff	GA
Sarah	Benzing	Senator Brown	OH
Stephen	Boyd	Senator Tuberville	AL
Dan	Brandt	Senator Toomey	PA
Joel	Brubaker	Senator Capito	WV
Jami	Burgess	Senator Cantwell	WA
Larry	Burton	Senator Sullivan	AK
Neil	Campbell	Senator Reed	RI
Craig	Carbone	Senator Rick Scott	FL
Terry	Carmack	Senator McConnell	KY
Steve	Chartan	Senator Cruz	TX
Kyle	Chase	Senator Rounds	SD
Dara	Cohen	Senator Rosen	NV
John	Connell	Senator Young	IN
Kathleen	Connery Dawe	Senator King	ME
Doug	Coutts	Senator Cotton	AR
Jen	Cox	Senator Kelly	AZ
Aaron	Cummings	Senator Grassley	IA
Doug	Davis	Senator Hyde-Smith	MS
Jennifer	DeCasper	Senator Tim Scott	SC
Watson	Donald	Senator Shelby	AL
Jon	Donenberg	Senator Warren	MA
JP	Dowd	Senator Leahy	VT
Veronica	Duron	Senator Booker	NJ
Tony	Eberhard	Senator Hoeven	ND
Eric	Einhorn	Senator Schatz	HI
Scott	Fairchild	Senator Cortez Masto	NV
Elizabeth	Falcone	Senator Warner	VA
Sean	Farrell	Senator Blackburn	TN
Jess	Fassler	Senator Gillibrand	NY
Kaleb	Froehlich	Senator Murkowski	AK
Kristen	Gentile	Senator Casey	PA
Lisa	Goeas	Senator Ernst	IA
Marc	Goldberg	Senator Hassan	NH
David	Grannis	Senator Feinstein	CA
Mark	Gruman	Senator Cramer	ND
Coti	Haia	Senator Hirono	HI
William	Henderson	Senator Paul	KY
Mike	Henry	Senator Kaine	VA

Bipartisan Senate Chiefs of Staff Conference September 10-12, 2021
List of Invited Staff

Allison	Herwitt	Senator Murphy	CT
Natasha	Hickman	Senator Burr	NC
Toni-Marie	Higgins	Senator Boozman	AR
Luke	Holland	Senator Inhofe	OK
Beth	Jafari	Senator Cornyn	TX
Liz	Johnson	Senator Romney	UT
Meg	Joseph	Senator Sinema	AZ
Josh	Karetny (acting)	Senator Whitehouse	RI
Joshua	Kelley	Senator Braun	IN
James	Kelly	Senator Moran	KS
Joel	Kelsey	Senator Blumenthal	CT
Lindsey	Kerr	Senator Klobuchar	MN
Chad	Kreikemeier	Senator Shaheen	NH
Dan	Kunsman	Senator Barrasso	WY
Dylan	Laslovich	Senator Tester	MT
Ted	Lehman	Senator Tillis	NC
Emily	Leviner	Senator Fischer	NE
Mark	Libell	Senator Warnock	GA
Mindi	Linguist	Senator Murray	WA
Jeff	Lomonaco	Senator Smith	MN
Chris	Lynch	Senator Cardin	MD
Mike	Lynch	Senator Schumer	NY
Stacy	McBride	Senator Blunt	MO
Kirtan	Mehta	Senator Hickenlooper	CO
Jeff	Michels	Senator Wyden	OR
David	Montes	Senator Padilla	CA
Mike	Needham	Senator Rubio	FL
Ryan	Nelson	Senator Thune	SD
Richard	Perry	Senator Graham	SC
Kyle	Plotkin	Senator Hawley	MO
James	Quinn	Senator Cassidy	LA
John	Rader	Senator Hagerty	TN
Misty	Rebik	Senator Sanders	VT
Ken	Reidy	Senator Baldwin	WI
Michelle	Richardson	Senator Wicker	MS
Sean	Riley	Senator Johnson	WI
Brent	Robertson	Senator Marshall	KS
Nick	Rossi	Senator Thune	SD
Tricia	Russell	Senator Van Hollen	MD
Carlos	Sanchez	Senator Lujan	NM
Ray	Sass	Senator Sasse	NE
Rob	Skjonsberg	Senator Rounds	SD
Jess	Smith	Senator Bennet	CO
Kevin	Smith	Senator Portman	OH

Bipartisan Senate Chiefs of Staff Conference September 10-12, 2021
List of Invited Staff

Sharon	Soderstrom	Senator McConnell	KY
Patrick	Souders	Senator Durbin	IL
Emily	Spain	Senator Carper	DE
Jonathan	Stahler	Senator Coons	DE
Caitlyn	Stephenson	Seantor Peters	MI
David	Stokes	Senator Kennedy	LA
Jason	Thielman	Senator Daines	MT
Kalina	Thompson	Senator Duckworth	IL
Jason	Tuber	Senator Menendez	NJ
Matt	VanKuiken	Senator Stabenow	MI
Erin	Vaughn	Senator Schumer	NY
Kristin	Walker	Senator Lummis	WY
John	Walsh	Senator Markey	MA
Lance	West	Senator Manchin	WV
Susan	Wheeler	Senator Crapo	ID
Ryan	White	Senator Risch	ID
Alan	Yamamoto	Senator Hirono	HI
Michael	Zamore	Senator Merkley	OR

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JAMES LANKFORD, OKLAHOMA, VICE CHAIRMAN

BRIAN SCHATZ, HAWAII
JEANNE SHAHEEN, NEW HAMPSHIRE

JAMES E. RISCH, IDAHO
DEB FISCHER, NEBRASKA

DEBORAH SUE MAYER, CHIEF COUNSEL AND STAFF DIRECTOR
WILLIAM CABLE, CHIEF CLERK

HART SENATE OFFICE BUILDING, ROOM 220
SECOND AND CONSTITUTION AVENUE, NE
WASHINGTON, DC 20510-6425

TELEPHONE: (202) 224-2981
FACSIMILE: (202) 224-7416
TDD: (202) 228-3752

United States Senate

SELECT COMMITTEE ON ETHICS

September 2, 2021

Michelle Barlow Richardson
Office of Senator Roger F. Wicker
United States Senate
Washington, DC 20510

Dear Ms. Richardson:

This responds to your recent correspondence requesting approval from the Select Committee on Ethics (the Committee) to accept an invitation you received to travel to the *Bipartisan Senate Chiefs of Staff Conference* in New York, New York, on September 10–12, 2021, sponsored by The Pew Charitable Trusts (Pew). Provided that you adhere to the guidance set forth below, it appears that it is permissible for you to accept necessary expenses from Pew in connection with this trip.

Background

Based on your communication with the Committee, the background in this matter is as follows.¹ You are employed as the Chief of Staff in the Office of Senator Roger F. Wicker. Pew invited you to travel to the *Bipartisan Senate Chiefs of Staff Conference* in New York, New York, on September 10–12, 2021. Pew certified to the Committee that it will pay the necessary expenses² related to the travel and that it is neither a lobbyist, lobbying firm, agent of a foreign principal, or otherwise acting as a representative or agent of a foreign government. Although Pew retains or employs a federally registered lobbyist or foreign agent, Pew has certified that it is an organization designated under § 501(c)(3) of the Internal Revenue Code³ and that no registered lobbyist or agent of a foreign principal will accompany you at any point throughout your trip.⁴

Discussion

Privately-sponsored travel includes any gift of travel and travel-related expenses for travel outside the Senate duty station, including transportation, lodging, food and refreshments, and conference fees and materials, whether paid for directly, reimbursed, or provided directly,

¹ If this letter does not correctly recite the facts, contact the Committee immediately.

² The term “necessary expenses” has a specific definition. See *Select Committee on Ethics’ Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 8.

³ 26 U.S.C. § 501(c)(3).

⁴ The term “any point throughout your trip” has a specific definition. See *Select Committee on Ethics’ Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 2-3.

from a private individual or entity, in connection with a Member's, officer's, or employee's official Senate duties. Incorporating reforms from the Honest Leadership and Open Government Act of 2007 (HLOGA), Pub. L. 110-81 (2007), Senate Rule 35.2 permits Members, officers, and employees to accept privately-sponsored travel only with the prior written approval of the Committee.

The Committee's approval process is governed by the *Regulations and Guidelines for Privately-Sponsored Travel and Glossary of Terms* (collectively, *Travel Regulations*). The *Travel Regulations* contain detailed requirements regarding who may sponsor travel; time limits for trips; and the type and amount of expenses that can be reimbursed.

All non-profit organizations designated as tax-exempt organizations under § 501(c)(3) of the Internal Revenue Code of 1986, regardless of whether they retain or employ a lobbyist or foreign agent, may sponsor domestic trips for up to three days. The three-day limitation means three 24-hour periods, calculated from the time of arrival in the trip location to the time of departure from the trip location. For such trips, neither lobbyists nor foreign agents may accompany a Senate invitee at any point throughout the trip, other than in a *de minimis* way.⁵ This means that neither lobbyists nor foreign agents may accompany Senate invitees at any point to and from the event, at the event itself, or at the location being visited.⁶

Under Senate Rule 35, Senate staff must receive advance authorization signed by the Member or officer under whose direct supervision the individual works in order to accept payment or reimbursement for necessary expenses related to fact-finding travel. Further, such authorization and expenses must be disclosed to the Secretary of the Senate by filing the completed *Employee Pre-Travel Authorization* and the *Employee Post-Travel Disclosure of Travel Expenses* (Form RE-1 and Form RE-2), along with a copy of the *Private Sponsor Travel Certification Form*, and all relevant attachments (e.g., the private sponsor's invitation and itinerary) **within 30 days of the conclusion of Privately-Sponsored Travel**.

Consistent with these standards and Committee precedent and Pew's factual representations, it appears that it is permissible for you to accept necessary expenses from Pew in connection with this trip, provided that the actual travel and travel-related expenses conform to the information and materials you provided, and the travel and all required documents are disclosed to the Secretary of the Senate (Office of Public Records).

Finally, Senate Rule 34 requires a reporting individual,⁷ on his or her Financial Disclosure Report, to make an annual disclosure of the receipt of payments or reimbursements under Senate Rule 35 from a private sponsor for officially-related travel expenses where, in the aggregate, travel expenses exceed \$415 from that sponsor during a calendar year. However, if a

⁵ The term "*de minimis*" has a specific definition. See *Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 3.

⁶ See *Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel* at 5; see also *Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 2-3.

⁷ A reporting individual is someone whose salary equals or exceeds 120% of the basic rate of pay for GS-15 (\$132,552 for CY 2021) or is a political fund designee and is required to file Financial Disclosure Reports.

Member, officer, or employee properly reports the receipt of necessary expenses for such travel to the Secretary of the Senate within 30 days of the travel, as discussed above, the travel expenses need not be disclosed a second time on their Financial Disclosure Report.

I hope you find this information helpful. If you have any additional questions, please do not hesitate to contact the Committee.

Sincerely,



Shannon Hamilton Kopplin
Acting Chief Counsel and Staff Director

Enclosure: Travel Checklist